

EXHIBIT 5

30(b)(6) Deposition of Wendell Stone - Excerpts

***PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANTS
CCBOER AND COUNSEL***

CGG, et al. v. Coffee Cty. Bd. of Elections and Registration
United States District Court for the Southern District of Georgia
No: 5:23-mc-00001-LGW-BWC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Donna Curling, et al.,

Plaintiffs,

CIVIL ACTION FILE

vs.

NO. 1:17-cv-02989-AT

Brad Raffensberger, et
al.,

Defendants.

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VIDEO 30(b)(6) DEPOSITION OF  
COFFEE COUNTY BOARD OF ELECTIONS & REGISTRATION  
THROUGH  
WENDELL STONE

September 1, 2022

9:07 a.m.

Suite 3250, One Atlantic Center  
1201 W. Peachtree Street  
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476

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Also Present:

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Krevolin & Horst LLC  
Ernestine Thomas-Clark  
Jesse Wiggins, Videographer

1 this.

2 Q. (By Mr. Brown) Do you know what that is?

3 A. This, the Hand Recount Recap.

4 Q. Do you know where -- where the plaintiffs  
5 in that case would have gotten that recap from?

6 MR. DELK: Object to the form.

7 THE WITNESS: I --

8 Q. (By Mr. Brown) If you --

9 A. I don't know.

10 Is this not a matter of public record?

11 Q. I'm not sure.

12 MR. DELK: Just answer the question, if  
13 you know it.

14 THE WITNESS: I don't know.

15 Q. (By Mr. Brown) You -- You may have been  
16 asked some these, and I'll just try to sum up quick  
17 on that.

18 Are you aware of any investigation of  
19 Coffee County by the Secretary of State, the SEB, or  
20 the GBI into the breach in January 2021 of Coffee  
21 County's election system?

22 A. I'm not aware.

23 Q. Have you been contacted by the F -- by the  
24 GBI?

25 A. I have not.

1 MR. DELK: Object to the form to extent he  
2 may not know about communications with counsel.

3 But subject to that he's welcome to  
4 respond.

5 Q. (By Mr. Brown) Do you know if your lawyer  
6 was contacted by the GB --

7 A. Contacted by who?

8 Q. GBI.

9 A. I don't know if my lawyer was contacted by  
10 GBI.

11 Q. Do you know -- Do you know of anybody  
12 being contacted by the GBI as of today?

13 MR. DELK: Same objection.

14 You can respond.

15 THE WITNESS: I don't know.

16 Q. (By Mr. Brown) And you -- you knew that  
17 my client, Coalition for Governance, has informed  
18 Coffee County many months ago of the suspicion of  
19 this breach, right?

20 A. I'm not wind -- I'm not sure of when  
21 Coffee County was informed of the breach. The real  
22 concern came through the media presentations.

23 Q. You mean more recently?

24 A. Well, I mean, whenever they first came  
25 out.

C E R T I F I C A T E

STATE OF GEORGIA:

County OF FULTON:

I hereby certify the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 282 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 6th day of September, 2022.



S. JULIE FRIEDMAN, CCR-B-1476